

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No:	16-13470
Yolanda Sepulveda)		
Debtor,)	Chapter:	Chapter 13
)		
)	Judge:	Janet S. Baer

NOTICE OF MOTION

To: Yolanda Sepulveda, 17 Yardley Ct., Glendale Heights, IL,
60139

Glenn B. Stearns, 801 Warrenville Rd. Suite 650, Lisle, IL,
60532

Office of the US Trustee, 219 S. Dearborn, Suite 873,
Chicago, IL 60604

David A. Fruhuaf DC, 350 S. Schmale Rd., Ste. 110, Carol
Stream, IL 60188

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on the **2nd of August, 2019 at 09:30 a.m.**, I shall appear before the Honorable Judge Janet S. Baer in Kane County Courthouse, 100 S. 3rd St., #240, Geneva, IL and then and there present the attached **MOTION TO ALLOW CLAIM AS TIMELY FILED**, a copy of which is attached hereto.

By: /s/Alex Wilson
Alex Wilson

CERTIFICATE OF SERVICE

I, Alex Wilson, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, before the hour of 5:30 p.m., on July 18, 2019.

By: /s/Alex Wilson
Alex Wilson

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

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MOTION TO ALLOW CLAIM AS TIMELY FILED

NOW COMES the Debtor, Ms. Yolanda Sepulveda (the "Debtor"), by and through her attorneys, Geraci Law LLC, to present her **MOTION TO ALLOW CLAIM AS TIMELY FILED**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b)(2).
2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 04/20/2016.
3. The plan was confirmed by this Court on 07/22/2016.
4. In June 2019, the Debtor was notified of \$36,000.91 pre-petition debt owed to David A. Fruhuaf DC.
5. The deadline for non-governmental creditors to file claims expired 08/16/2016.
6. David A. Fruhuaf DC never filed a proof of claim.
7. Debtor's attorneys filed a proof of claim on 07/18/2019, after the deadline had passed.
8. The Debtor would like to pay this debt through her Chapter 13 plan.

enter an order:

1. Allowing the proof of claim for David A. Fruhuaf DC as being timely filed,
2. And any other relief that this court allows just and proper.

/s/Alex Wilson
Alex Wilson

Attorneys for the Debtor

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